

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Jeffrey A Schurr	Chapter 13
Debtor	Bankruptcy No. 17-13274-SR
Ditech Financial LLC, or its Successor or Assignee	
Movant	
vs.	
FREDERICK L. REIGLE, Trustee	
Jeffrey A Schurr	
Respondents	

**OBJECTION TO PLAN**

Ditech Financial LLC ("Creditor") is a secured creditor of the above Debtor and by its counsel hereby objects to the Debtor's Chapter 13 Plan ("Plan") as follows:

1. Creditor is in the process of filing a Proof of Claim with respect to its secured interest in real property of the Debtor or of the estate which is commonly known as and located at 1018 Friendship Street, Philadelphia, Pennsylvania 19111 ("Property"); such Proof of Claim will indicate an estimated arrearage claim in the amount of \$20,520.17.

2. The Plan proposes to pay \$18,182.00 towards Creditor's arrearage claim; accordingly, the Plan does not provide for the full value of Creditor's claim. A copy of the Debtor's Chapter 13 Plan is attached hereto as Exhibit A.

3. The Property is the primary residence of the Debtor.

4. The provisions of 11 U.S.C. § 1322(b)(2) prohibit debtors from modifying, through the Plan, the rights of secured creditors holding an interest in real property secured only by a Debtor's principal residence. To the extent the Plan attempts to do so, it cannot be confirmed.

5. The Plan violates the provisions of 11 U.S.C. § 1325(a)(3) and 11 U.S.C. § 1325(a)(5)(B)(ii) to the extent that it fails to provide Creditor with the full value of its claim.

WHEREFORE, for the foregoing reasons, Ditech Financial LLC requests that an Order

be entered denying confirmation of the Chapter 13 Plan and for such other and further relief as is

just.

/s/ Celine P. DerKrikorian

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